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BY HAND DELIVERY

Hon. Joan M. Azrack
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

RE: 15-cv-0014; 14-cv-0015 (JMA),
Berlin v. Zaretsky et al

Your honor,

While preparing my brief in this case which is due by June 22, 2015, it occurred to me that I am running out of time to file a motion per rule 60 or Bankruptcy Rule 9024 in this Bankruptcy case by June 22 as well, I respectfully request an extension of one week to file the brief by June 29 instead, to allow me to meet the deadline and file said motion first.

I had inadvertently miscalculated the times, as I had in my confused in my mind the date of the judgment of the Bankruptcy court as being July rather than June. For certain grounds my time will run out a year from the judgment which was June 19, 2014, which is June 22 counting from June 20 with weekend.

I have previously stated to the court in a letter dated February 19, 2015, about such a motion, which I was unable to tackle before. In the course of going through paperwork this week it suddenly occurred to me that I am nearly out of time. Failing to file on or before June 22, may prejudice me to lose that chance.

I emailed counsel Mr. Hufnagel yesterday seeking his consent for the extension, stating that I will not be seeking any more extensions after this. He consented providing I obtain approval from the court. I have previously sought an extension to file the initial briefs, and the court issued the filing order recently to file by June 22.

Additionally, I also stated to counsel that I intend to file one combined brief instead of two in the two appeals cases referenced above, because I can barely manage with one, and the issues are basically identical and the same, it is only the standard of review on the second appeal case, and which I can reference in the same brief. Counsel has not objected to this, however, should the court prefer that I file two separate briefs, I will certainly do so, but it may take me more time to prepare it.

I apologize that this is an unforeseen event, which I had been unable to foresee or handle previously due to my health, and I am thankful to the court for considering my request.

Very truly yours,

Ahron Berlin

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cc: Brian Hufnagel, Esq.,
(bhufnagel@torchellilaw.com)

JUN 18 2015

EDNY PRO SE OFFICE